

|        |                             |   |                        |
|--------|-----------------------------|---|------------------------|
| IN RE: | MARK JOSEPH KOSEK and       | : | CHAPTER 13             |
|        | CAROL LYN KOSEK             | : |                        |
|        | Debtors                     | : |                        |
|        |                             | : |                        |
|        | JACK N. ZAHAROPOULOS        | : |                        |
|        | STANDING CHAPTER 13 TRUSTEE | : |                        |
|        | Movant                      | : |                        |
|        |                             | : |                        |
|        | vs.                         | : |                        |
|        |                             | : |                        |
|        | MARK JOSPEH KOSEK and       | : |                        |
|        | CAROL LYN KOSEK             | : |                        |
|        | Respondents                 | : | CASE NO. 5-21-bk-02442 |

WHEREFORE, Trustee alleges and avers that debtors' plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 4th day of January, 2022, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Tullio DeLuca, Esquire  
381 N. 9<sup>th</sup> Avenue  
Scranton, PA 18504

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee